

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY, IN HIS CAPACITY AS
COURT-APPOINTED RECEIVER FOR THE
STANFORD INTERNATIONAL BANK, LTD.,
ET AL., and the OFFICIAL STANFORD
INVESTORS COMMITTEE,

Plaintiffs,

Case No. 3:11-CV-0297-N-BG

V.

PETER F. ROMERO,

Defendant.

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AGREEMENT AND STIPULATION REGARDING CERTAIN PRETRIAL AND TRIAL MATTERS

Plaintiffs Ralph S. Janvey and the Official Stanford Investors Committee and Defendant Peter F. Romero (collectively, the “Parties”) hereby stipulate and agree as follows, and respectfully submit this stipulation for approval by the Court:

1. Agreements concerning exhibits
 - a. The Parties agree that all exhibits to which no objection has been asserted by the deadline established in Rule 26(a)(3)(B) shall be pre-admitted. As a result, to the extent that a party has a Rule 402 or 403 objection, that objection must be asserted by the deadline for asserting all other exhibit objections.
 - b. The Parties agree to confer ten (10) days before trial to attempt to resolve any exhibit objections. Any exhibits for which the Parties are able to resolve all objections shall be pre-admitted.

- c. The Parties agree that they shall not be required to exchange demonstratives simultaneously with exhibits. The deadlines applicable to the exchange of demonstratives are set forth further herein.
- 2. Agreements concerning deposition designations
 - a. No later than twenty-one (21) days before trial, each Party shall serve objections to the other Party's deposition designations and shall serve cross-designations.
 - a. No later than fourteen (14) days before trial, each Party shall serve objections to the other Party's cross-designations.
 - b. The Parties agree to confer ten (10) days before trial to attempt to resolve any objections to deposition designations and cross-designations.
- 3. Agreements concerning motions in limine
 - a. No later than fourteen (14) days before trial, each Party shall file his response to the other Party's motion in limine.
 - b. The Parties agree to confer ten (10) days before trial to attempt to resolve any issues raised by their motions in limine.
- 4. Agreements concerning opening demonstratives
 - a. No later than five (5) days before trial, each Party shall serve the other Party with copies of demonstratives that the Party intends to use in his opening statement.
 - b. The Parties agree to confer three (3) days before trial to discuss any objections that either of them may have to the other Party's opening demonstratives.
- 5. Agreements concerning trial demonstratives and other trial logistics
 - a. Beginning on Sunday, February 8th through the end of trial, each Party shall, by 7:00 p.m., serve the other Party with copies of demonstratives that the Party

intends to use the following day (except that the deadline applicable to demonstratives to be used in opening statements is governed by paragraph 4), and identify all witnesses to be called the following day.

- b. The Parties agree to request a conference with the Court to resolve any objections to demonstratives at the beginning of the day (prior to the time at which the jury will be seated) on which the demonstratives are to be used. The Parties agree to discuss with the Court at the pretrial hearing the timing for the resolution of any remaining exhibit objections.
6. To the extent that this stipulation requires either Party to serve a document, such service may be accomplished by emailing the document as follows:
 - a. For service on the Plaintiffs, the document shall be emailed to kevin.sadler@bakerbotts.com, scott.powers@bakerbotts.com, sherwin.faridifar@bakerbotts.com, and lynne.dodge@bakerbotts.com.
 - b. For service on Romero, the document shall be emailed to lbowman@krcl.com, bclark@krcl.com, and kedwards@krcl.com.

The Court, having reviewed the Parties' stipulation, finds that it should be, and is hereby, APPROVED. The Parties shall therefore govern their conduct in conformity with this stipulation.

Signed this ____ day of _____, 2015

David C. Godbey
United States District Judge

AGREED AND ENTRY REQUESTED:

BAKER BOTTS L.L.P.

Date: January 7, 2015

By:/s/ Scott D. Powers

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Date: January 7, 2015

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Date: January 7, 2015

By: /s/ Brian W. Clark

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**ATTORNEYS FOR
DEFENDANT PETER F. ROMERO**

CERTIFICATE OF SERVICE

On January 7, 2015, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve all counsel of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Scott D. Powers

Scott D. Powers